

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:)	Chapter 13
KEVIN J. URBINE)	No. 19-17901-pmm
Debtor)	
)	
SANTANDER BANK, N.A.)	MOTION FOR STAY RELIEF
Movant)	43 Valley Road, Wyomissing, PA
vs.)	
)	
KEVIN J. URBINE)	
VALERIE A. URBINE)	Hearing Date: <u>May 24, 2022</u>
Respondents)	Time: <u>10:00 a.m.</u>
)	

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**NOTICE OF MOTION, RESPONSE DEADLINE
AND HEARING DATE**

SANTANDER BANK, N.A. (“Santander Bank”) has filed a Motion for Relief from the Automatic Stay with the Court seeking to terminate the automatic stay provisions with regard to Santander Bank, and to allow Santander Bank to proceed with state court remedies against your property located at 43 Valley Road, Wyomissing, Berks County, PA, including a Sheriff’s Sale of the Premises.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before **May 12, 2022** you or your attorney must do all of the following:
- (a) file an answer explaining your position at:

Bankruptcy Clerk's Office
Gateway Building
201 Penn Street
Reading, PA 19601

If you mail your answer to the Bankruptcy Clerk's Office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to the movant's attorney:

Kellie Rahl-Heffner, Esq.
Gross McGinley, LLP
33 S. 7th Street, PO Box 4060
Allentown, PA 18105
Phone No. 610-820-5450
Fax No. 610-820-6006

2. If you or your attorney do not take the steps described in Paragraphs 1(a) and 1(b) above and attend the hearing, the Court may enter an order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before the Honorable Patricia M. Mayer on **May 24, 2022 at 10:00 a.m.** in 4th Floor Courtroom, United States Bankruptcy Court, Gateway Building, 201 Penn Street, Reading, PA 19601.

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in Paragraph 1(b).

5. You may contact the Bankruptcy Clerk's Office at (610) 208-5030 to find out whether the hearing has been canceled because no one filed an answer.

Date: April 28, 2022